

ORIGINAL

MEMO ENDORSED

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LYNNE FREEMAN,

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY, et al.

Defendants.

USDC-23NY
DOCUMENT
ELCTRONICALLY FILED
DOC #:
DATE FILED: <u>7/20/23</u>

Case No. 22-cv-02435 (LLS)(SN)

**PLAINTIFF'S NOTICE OF MOTION
FOR RECONSIDERATION OF THE
COURT'S JUNE 14, 2023 ORDER**

*Granted -
Louis L. Stanton
7/20/23*

TO THE HONORABLE COURT, ALL PARTIES, AND COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT, pursuant to L.R. 6.3, Plaintiff Lynne Freeman, through her undersigned counsel, upon the accompanying Memorandum of Law, Declaration of Stephen M. Doniger and Lynne Freeman, respectfully moves the Court before the Honorable Louis L. Stanton, U.S.D.J., at the United States District Court for the Southern District of New York, 500 Pearl Street, Courtroom 21C, New York, New York 10007, for reconsideration of the Court's June 14, 2023, Order for "a separate jury trial on whether the Crave series and plaintiff's manuscripts are substantially similar," and asks this Court to permit a single jury trial on her claims as that will be far more streamlined and efficient as well as fair and cost effective for all parties.

PLEASE TAKE FURTHER NOTICE that Plaintiff respectfully requests oral argument if this motion is opposed. Pursuant to Section 2.E. of the Court's Individual Rules, a general return date is set and an oral argument date will be established by the Court should the Court permit oral argument.

Dated: June 20, 2023
Venice, CA

Respectfully submitted,

By: /s/ Stephen Doniger
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